## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

PECO PALLET, INC.,	)	
Plaintiff,	)	Case No.: 15-cv-6811
	)	Honorable Andrea R. Wood
v.	)	
NORTHWEST PALLET SUPPLY CO.,	)	Magistrate Judge Michael T. Mason
Defendant.	)	
NORTHWEST PALLET SUPPLY CO.,	)	
NORTHWEST PRESENTED CO.,	)	Case No.: 15-cv-50182
Plaintiff,	)	
	)	Honorable Andrea R. Wood
V.	)	Magistrate Judge Michael T. Mason
PECO PALLET, INC.,	)	
D 6 1	)	
Defendant.	)	

## NORTHWEST PALLET SUPPLY CO.'S MOTION FOR LEAVE TO FILE MOTION TO COMPEL AND TO EXTEND DISCOVERY FOR LIMITED PURPOSES UNDER SEAL

Northwest Pallet Supply Co. ("Northwest Pallet"), through its counsel, Tarpey Wix LLC, respectfully moves this Court pursuant to Rule 26(c) and Local Rule 26.2 for leave to file its Motion to Compel and to Extend Discovery for Limited Purposes under seal. In support of this Motion, Northwest Pallet states as follows:

- Northwest Pallet intends to file its Motion to Compel and to Extend Limited
   Discovery.
- 2. In order to apprise this Court of the basis for the Motion to Compel and to Extend Discovery for Limited Purposes and to provide a full explanation for why this Court should grant the Motion, Northwest Pallet feels compelled to discuss and explain certain communications,

deposition testimony, pleadings and documents that have been marked either "Confidential" or

"Confidential – Attorneys' Eyes Only" under the Protective Order entered in this case. The

Protective Order requires Northwest Pallet to obtain leave from this Court to file documents and

deposition testimony with those designations with this Court.

3. Allowing Northwest Pallet to file its Motion to Compel and to Extend Discovery

for Limited Purposes under seal will not prejudice either of the parties and will serve the interests

of justice and equity in this matter.

WHEREFORE, for the foregoing reasons, Northwest Pallet Supply Co., respectfully

requests leave of this Court to file its Motion to Compel and to Extend Discovery for Limited

Purposes under seal and for any other relief this Court deems proper and just.

**DATED**: January 22, 2018

Respectfully submitted,

Northwest Pallet Supply Co.

/s/ David G. Wix

Tarpey Wix LLC Attorneys for Plaintiff

Daniel W. Tarpey

David G. Wix

Matthew M. Showel

TARPEY WIX LLC

225 W. Wacker Drive, Suite 1515

Chicago, IL 60606

(312) 948-9090 Office

(312) 948-9105 Fax

2

## **CERTIFICATE OF SERVICE**

I, undersigned attorney, hereby certify that on January 22, 2018, I electronically filed Northwest Pallet Supply Co.'s Motion to For Leave to File its Motion to Compel and To Extend Discovery for Limited Purposes Under Seal with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ David G. Wix

David G. Wix
Tarpey Wix LLC
225 W. Wacker Drive, Suite 1515
Chicago, IL 60606
(312) 948-9090
dwix@tarpeywix.com
Attorney for Plaintiff